

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Proposed Amendments to the  
Commission's Rules

Docket No. RM2004-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
TO EXTEND DEADLINE FOR COMMENTS IN RESPONSE  
TO COMMISSION ORDER NO. 1424  
(December 3, 2004)

On November 12, 2004, the Postal Rate Commission issued Order No. 1424, soliciting further comments on its efforts to incorporate a definition of the term "postal service" into its rules. The date set for initial comments was December 15, 2004. The Postal Service hereby moves to extend the deadline for initial comments to February 1, 2005.

Order No. 1424 contains the second proposed definition of "postal service" advanced by the Commission in this proceeding. The first was submitted for comments on January 16, 2004 in Order No. 1389. Initial and reply comments in response to the definition proposed by Order No. 1389 were filed by April 15, 2004. As explained in Order No. 1424, however, the new definition constitutes a significant departure from what was contemplated in Order No. 1389. The full ramifications of the new approach embodied in Order No. 1424 need to be evaluated. In this regard, a number of factors complicate the timing of the Postal Service's response. These include the obligation to consider the implications of the shift within a broad organizational context, leading to

the need for briefing and consultation among several affected departments and at several levels of postal management. Unfortunately, attempting to coordinate the conflicting schedules of critical executives is even more difficult than usual during this time of year. As a result, the Postal Service concludes that it cannot adequately prepare its response prior to the established deadline of December 15.

The Postal Service therefore respectfully requests that the deadline for initial comments be extended to February 1, 2005. While this date may seem later than might ordinarily be requested under similar circumstances, the Postal Service submits that, in light of the factors noted above, the holiday season and various end-of-year activities would likely interfere with full achievement of the objective of the extension, if a less advanced deadline were selected.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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